

CONSTANTINE A. DESPOTAKIS, ESQ. (CD 4944)
WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP
3 Gannett Drive
White Plains, New York 10604
Tel.: (914) 323-7000
Attorneys for Defendant, Bank of America, N.A.

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X
PL SHIPPING & LOGISTICS LTD.

Plaintiff,

07 CV 2818 (SHS)

ANSWER TO DEFENDANT, H.J.M.
INTERNATIONAL, INC.'S
CROSSCLAIMS

-against-

H.J.M. INTERNATIONAL INC. and BANK OF
AMERICA and AFFORDABLE LUXURY
RYAN KENNY and RYAN GLOVER and
RONALD PLATOVSKY and ABN AMRO
BANK,

Defendants.
-----X

Defendant, Bank of America, N.A. (sued herein under its common trade name of "Bank of America") hereinafter "BOA", by its attorneys, Wilson, Elser, Moskowitz, Edelman & Dicker LLP, in answer to defendant, H.J.M. International, Inc.'s (hereinafter "H.J.M."), crossclaims against BOA asserted in H.J.M.'s answer to the second amended verified complaint of plaintiff answers as follows:

AS AND FOR AN ANSWER TO DEFENDANT,
H.J.M.'s CROSSCLAIMS AGAINST BOA

1. BOA denies each and every allegation contained in H.J.M.'s crossclaims as set forth in paragraphs 41 and 42 of H.J.M.'s answer to plaintiff's second amended verified

complaint, and BOA repeats, reiterates and realleges each and every crossclaim asserted by BOA against H.J.M. in this action as set forth in BOA's answer and crossclaims to plaintiff's second amended verified complaint the contents of which are incorporated by reference as though fully recited herein.

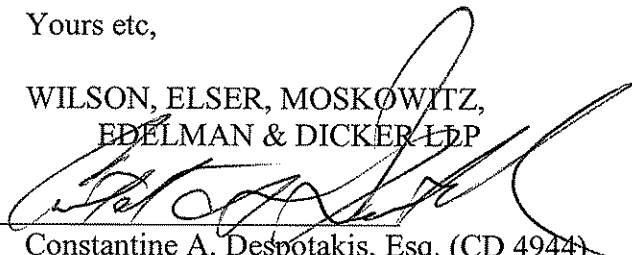
WHEREFORE, BOA respectfully requests an Order of the Court dismissing H.J.M.'s crossclaims and in the event plaintiff prevails in this action as against BOA, then an Order of the Court granting BOA judgment over against defendant H.J.M. pursuant to BOA's crossclaims, together with such other and further relief as to this Court may seem just and proper

Dated: White Plains, New York
August 17, 2007

Yours etc,

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

By


Constantine A. Despotakis, Esq. (CD 4944)
Attorneys for Defendant
BANK OF AMERICA, N.A.
3 Gannett Drive
White Plains, New York 10604
Tel. (914) 323-7000
Our File No. 02503.00305

To:

EUGENE J. MCDONALD, ESQ.
Attorneys for Plaintiff,
PL Shipping & Logistics Ltd.
170 Broad Street
Matawan, NJ 07747

Patrick Michael DeCharles II, Esq.
CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR
Attorneys for Defendant
H.J.M. International Inc.
61 Broadway, Room 3000
New York, NY 10006-2809

Affordable Luxury Ryan Kelly
Defendant *Pro Se*
1407 Broadway
New York, NY 10018

Jonathan S. Chernow, Esq.
White Fleischner & Fino LLP
Attorneys for Defendant
ABN AMRO BANK
140 Broadway, 36th Floor
New York, NY 10006

Ryan Glover
Defendant *Pro Se*
1407 Broadway
New York, NY 10018

Ronald Platovsky
Defendant *Pro Se*
1407 Broadway
New York, NY 10018

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF WESTCHESTER)

I, Geri Manno, being sworn, say:

I am not a party to the action, am over the age of 18 years of age and reside in Westchester County, New York. On August 17, 2007, I served the within ANSWER TO H.J.M. INTERNATIONAL INC.'S CROSSCLAIMS by depositing a true copy thereof enclosed in a postpaid wrapper, via First Class Mail, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to each of the following persons at the last known address set forth after each name:

EUGENE J. MCDONALD, ESQ.
Attorneys for Plaintiff,
PL Shipping & Logistics Ltd.
170 Broad Street
Matawan, NJ 07747

Patrick Michael DeCharles II, Esq.
CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR
Attorneys for Defendant
H.J.M. International Inc.
61 Broadway, Room 3000
New York, NY 10006-2809

Affordable Luxury Ryan Kelly
Defendant *Pro Se*
1407 Broadway
New York, NY 10018

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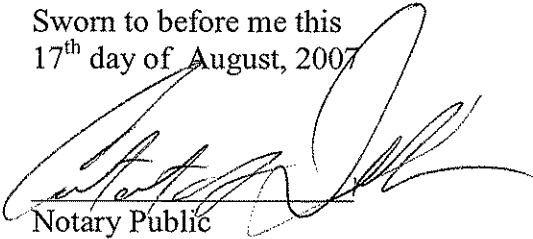
Ryan Glover
Defendant *Pro Se*
1407 Broadway
New York, NY 10018

Ronald Platovsky
Defendant *Pro Se*
1407 Broadway
New York, NY 10018



Geri Manno

Sworn to before me this
17th day of August, 2007



Notary Public

CONSTANTINE A. DIOPOYIAKIS
Notary Public, State of New York
No. 4615111
Qualified in Westchester County
Commission Expires 12/31/09